

1 SEVERA KEITH, SBN 218167  
2 LAW OFFICES OF SEVERA KEITH  
3 179 11<sup>th</sup> Street, Second Floor  
4 San Francisco, CA 94103  
(415) 626-6000 - Telephone  
(415) 865-0376 - Facsimile

5 Attorney for Defendant  
6 LATASHA RINGO

**FILED**

JAN 31 2013

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND

7 **IN THE UNITED STATES DISTRICT COURT**

8 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**

9 **OAKLAND DIVISION**

10 THE UNITED STATES OF AMERICA,

11 No. CR12-00816 PJH

12 Plaintiff,

13 vs.

14 LATASHA RINGO,

15 Defendant.

16 STIPULATION AND [PROPOSED]  
17 ORDER EXCLUDING TIME UNDER  
18 THE SPEEDY TRIAL ACT AND  
19 RESETTING STATUS HEARING

20 IT IS HEREBY STIPULATED AND AGREED between the plaintiff through its  
21 attorney, Michael Pitman, and the defendant through her attorney, Severa Keith, that  
22 time be excluded from January 22, 2013 to February 20, 2013 for effective preparation of  
23 counsel. As was stated in court on January 22, 2013, at defense counsel's appointment  
24 in this case, after the Federal Public Defender was relieved due to a conflict, the defense  
25 has received discovery from the government consisting of one DVD, and approximately  
26 five hundred printed pages. Defense counsel requires additional time to review the  
27

28 *Ringo: Stipulation to Exclude Time and Reset Status Hearing; [Proposed] Order*

1 produced discovery and conduct necessary investigation. The parties agree that the  
2 delay is not attributable to lack of diligent preparation on the part of the attorney for the  
3 government or defense counsel. For these reasons, the parties request that time under  
4 the Speedy Trial Act be excluded based on the defense's need for reasonable time  
5 necessary for effective preparation, taking into account the exercise of due diligence.

6 For the same reasons, the parties agree to reset the Status Hearing scheduled on  
7 January 30, 2013 to February 20, 2013, at 2:30 p.m.

8  
9 IT IS SO STIPULATED:

10 Dated: January 22, 2013

11 Respectfully Submitted,

12 /s/

13 Severa Keith CSBN: 218167  
14 Attorney for Defendant  
15 LATASHA RINGO  
16 179 11<sup>th</sup> Street, 2<sup>nd</sup> Floor  
17 San Francisco, CA 94103  
18 (415) 626-6000  
19 severakeith@gmail.com

20 Dated: January 22, 2013

21 /s/

22 Michael Pitman  
23 Assistant U.S. Attorney  
24 Office of The U.S. Attorney  
25 450 Golden Gate Avenue, Box 36055  
26 San Francisco, CA 94102  
27 (415) 436-6745  
28 Michael.pitman@usdoj.gov

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*Ringo: Stipulation to Exclude Time and Reset Status Hearing; [Proposed] Order*

## ORDER

GOOD CAUSE HAVING BEEN SHOWN, the Court finds that failing to exclude the time between January 22, 2013 and February 20, 2013 would unreasonably deny the defense the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between January 22, 2013 and February 20, 2013 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, it is hereby ordered that the time between January 22, 2013 and February 20, 2013 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §§3161(h)(7)(A) and (B)(iv). It is also ordered, for the same reasons, that the Status Hearing set for January 30, 2013 be reset to February 20, 2013, at 2:30 p.m.

DATED: January 30, 2013

*Kandis Westmore*  
HONORABLE KANDIS A. WESTMORE  
United States Magistrate Judge